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BY HAND DELIVERY

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

FILED/ACCEPTED

FEB 29 2008

Federal Communications Commission
Office of the Secretary

**EB Docket No. 06-36
EB-06-TC-060**

Re: CERTIFICATION OF CPNI COMPLIANCE FILING - FEBRUARY 29, 2008

Buggs Island Telephone Cooperative

499 Filer ID # 801312

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan
JSI Staff Director-Regulatory Affairs
sduncan@jsitel.com

Attachment

Copies: 4 additional copies to Secretary
2 copies to Telecommunications Consumers Division
Best Copy and Printing (BCPI)

No. of Copies rec'd 074
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BUGGS ISLAND TELEPHONE COOPERATIVE
100 Nellie Jones Road P.O. Box 129, Bracey, VA 23919

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

FILED/ACCEPTED

FEB 20 2008

Federal Communications Commission
Office of the Secretary

Annual 64.2009(e) CPNI Certification for 2007

Date signed: February 29, 2008

Names of Company Covered by this Certification:

499 Filer ID

Buggs Island Telephone Cooperative

801312

Name of signatory: Mickey L. Sims

Title of signatory: General Manager

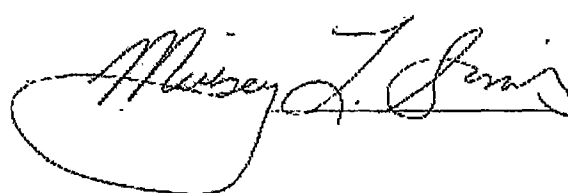
I, Mickey L. Sims, certify that I am an officer of Buggs Island Telephone Cooperative ("Company"), and acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2007 or related to 2007. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



Attachment

BUGGS ISLAND TELEPHONE COOPERATIVE
100 Nellie Jones Road P.O. Box 129, Bracey, VA 23919

499 Filer ID 801312

2007 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE

February 29, 2008

This statement accompanies the Company's 2007 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule sections refer to rules under Part 64, Subpart U unless otherwise indicated.

1. Uses of CPNI for Marketing

The Company limits use of CPNI for marketing to the following:

- a. Pursuant to Sections 64.2007(a) and 64.2008(f), the Company uses CPNI, subject to customer authorization, for one-time use during in-bound calls from customers.
- b. Pursuant to Section 64.2005(a), the Company uses CPNI from a category of telecommunications service (local, interexchange or wireless) for marketing limited to use for marketing services in the same category of service from which the CPNI is derived or to another category of telecommunications service to which the customer also subscribes.

2. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

3. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

4. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

5. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

6. Customer One-Time Notification and Authorization Process

The Company has developed procedures for one-time oral notification of customers making inbound calls regarding CPNI pursuant to the requirements of Section 64.2007 generally and Section 64.2007(f) specifically.

7. Record of Customer CPNI Approval/Non-Approval

At such time as Company may initiate use of CPNI for outbound marketing of services outside a category currently provided to a customer, with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

8. Procedures Protecting Against Disclosure of CPNI

During 2007, the Company implemented procedures or confirmed existing procedures for compliance with new Section 64.2010 including, but not limited to the following:*

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company has implemented procedures to provide immediate notification to customers of account changes, including changes in address-of-record and attempts at access to CPNI through use of back-up methods due to forgotten passwords.

*The Company did not provide online access to customers for billing information during 2007.

9. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable. No actions taken against data-brokers.
No customer complaints received.

10. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

11. Supervisory Review Process for Outbound Marketing

The Company has a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart J CPNI rules as well as related record-keeping pursuant to Section 64.2009(e).

12. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related record-keeping and debriefed notification to customers. During 2007, no such breaches.